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Attorneys for Plaintiffs
Musical Kidz, LLC itself and doing business as Music For Little People (which was
erroneously sued as a dissolved California corp.), For Future Generations, Inc. and Leib
Ostrow

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

YSAYE BARNWELL, an individual;
AISHA KAHILL, an individual; CAROL
MAILLARD, an individual; NITANJU B.
CASSEL, an individual; and LOUISE
ROBINSON, an individual, collectively
p/k/a/ "SWEET HONEY IN THE ROCK",

Plaintiffs,

vs.

MUSICAL KIDZ, LLC, a California
limited liability company; FOR FUTURE
GENERATIONS, INC., a dissolved
California corp.; MUSIC FOR LITTLE
PEOPLE, a dissolved California corp.;
TRUDY CORPORATION, a Connecticut
Corp., and LEIB OSTROW, an individual;
and DOES 1 through 50, inclusive,

Defendants.

Case No. C 10-04119 JCS

Transferred from Central District Case
No. CV10-1614 MMM (JCx)

**SECOND STIPULATION (NDCA)
SETTING TIME TO RESPOND TO
INITIAL COMPLAINT AND TO
EXTEND TIME TO FILE RULE 26
(F) STATEMENT AND
RESCHEDULING INITIAL CASE
MANAGEMENT CONFERENCE**

**[PROPOSED] ORDER SUBMITTED
SEPARATELY AS PDF
ATTACHMENT TO THIS
DOCUMENT**

**OLD INITIAL CONFERENCE
DATE:**

JANUARY 7, 2011; 1:30 P.M.

**NEW INITIAL CONFERENCE
DATE:**

JANUARY 28, 2011; 1:30 P.M.

1 WHEREAS, on September 7, 2010, the United States District Court for the Central
 2 District of California, the Honorable Margaret M. Morrow, granted the motion of
 3 Defendants Musical Kidz, LLC, For Future Generations, Inc., Music For Little People, and
 4 Leib Ostrow (the "Served Defendants") to transfer the venue of this action to the United
 5 States District Court for the Northern District of California; and

6 WHEREAS, on September 14, 2010, the Complaint in this action was listed as being
 7 filed in the United States District Court for the Northern District of California; and

8 WHEREAS, the Served Defendants, pursuant to stipulation, have not filed their
 9 responses to the Complaint after it was transferred; and

10 WHEREAS, Plaintiffs and the Served Defendants have agreed to a settlement in
 11 principle of all outstanding issues which is in the process of being documented by the
 12 parties and which will result in a dismissal of this entire action, and

13 WHEREAS, a settlement among these parties will resolve all issues in this matter as
 14 to all Defendants; and

15 WHEREAS, to facilitate the settlement process, Plaintiffs and the Served Defendants
 16 would like a brief extension of all deadlines so that they may concentrate on settlement
 17 instead of litigation.

18 NOW THEREFORE, the parties hereto, by and through their respective counsel of
 19 record hereby stipulate and agree as follows:

20 1. The Served Defendants time to plead in response to the initial complaint shall
 21 be extended so that the Served Defendants' responsive pleading will now be due on or
 22 before January 7, 2011.

23 2. The Scheduling Conference will be rescheduled from January 7, 2011 at 1:30
 24 p.m. to January 28, 2011 at 1:30 p.m. and the Rule 26 (f) report will be filed on or before
 25 January 21, 2011.

26 **IT IS SO STIPULATED.**

1 Dated: December 6, 2010

LAW OFFICE OF REGINALD K. BROWN
Reginald K. Brown

2 _____
3 _____

By: /s/

Reginald K. Brown
Attorneys for Plaintiffs Ysaye Barnwell,
Aisha Kahill, Hitanju B. Cassel and
Louise Robinson, collectively p/k/a/
"Sweet Honey In The Rock"

6 Dated: December 6, 2010

FREUNDLICH LAW
Kenneth D. Freundlich

8 

9 By:

:

Kenneth D. Freundlich
Attorneys for Defendants Musical Kidz,
LLC itself and doing business as Music
For Little People (which was erroneously
sued as a dissolved California corp.), For
Future Generations, Inc. and Leib Ostrow

14 I received e-mail confirmation from Mr. Brown that I should affix the '/s/' to
15 his signature line and I have done so.

18 By:

19 

:

Kenneth D. Freundlich

23 Dated: December 8, 2010

